

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

MBF Inspection Services, Inc.

Debtor.

Case No. 18-11579

Chapter 11

**MOTION TO EXTEND THE EXCLUSIVE PERIOD
IN WHICH THE DEBTORS HAVE TO FILE A CHAPTER 11 PLAN**

COMES NOW the Debtor by and through counsel, Jennie D. Behles of B.L.F., LLC and does move this Court for the entry of an Order extending the time in which the Debtor has the exclusive option to file a Chapter 11 Plan and Disclosure Statement in this case. This Motion is filed pursuant to 11 U.S.C. § 1121 (B) AND (D). As cause therefor, the Debtors state:

1. The Debtors filed a Chapter 11 Voluntary Petition on July 22nd, 2018.
2. This Motion is timely filed pursuant to 11 U.S.C. § 1121 (b) and (d).
3. The Plan has been written but is not yet complete because we have been unable to get the Motions on the claims set due to Objections and we also have many other Motions and issues which have not yet been resolved by the court.

5. The U.S. Trustee has been contacted and
_____ consents _____ does not consent ____x____ has not responded.

6. James Roggow has been contacted and
_____ consents _____ does not consent ____x____ has not responded.

7. Louis Puccini, Jr. has been contacted and
_____ consents _____ does not consent ____x____ has not responded.

WHEREFORE, the Debtor moves the Court for an Order granting this extension of

exclusivity for 60 days and for such further relief as the Court deems just herein.

Respectfully submitted,

Behles Law Firm, P.C.

By: /s/Jennie Deden Behles
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Certificate Of Service

I certify that I sent a true and correct copy of the foregoing to the parties listed herein on October 22nd, 2018, via the Courts electronic noticing system, CM/ECF.

Leonard Martinez-Metzgar
United States Trustee
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Albuquerque, NM 87103
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James A. Roggow
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By: s/ filed electronically
Jennie Deden Behles

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